

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

| | | |
|---|---|-----------------------------|
| IN RE: | : | |
| PATRICIA F. KENT | : | Bk. No. 19-16345-amc |
| Debtor | : | |
| | : | Chapter No. 13 |
| NEWREZ LLC D/B/A SHELLPOINT MORTGAGE SERVICING | : | |
| Movant | : | |
| v. | : | |
| PATRICIA F. KENT | : | |
| Respondent | : | |

**NOTICE OF COVID-19 MORTGAGE FORBEARANCE AGREEMENT PURSUANT TO
LOCAL ORDER 20-3007**

The undersigned, Phelan Hallinan Diamond & Jones, LLP, are creditor's counsel in this matter.

1. Debtor currently has a mortgage with **NEWREZ LLC D/B/A SHELLPOINT MORTGAGE SERVICING**. The property address is 25 QUINCE CIRCLE, NEWTOWN, PA 18940, Loan # ending in 3468. A Proof of Claim has been filed on the claim register at #9. A written Notice of Payment Change/Forbearance is being filed on the claims docket pursuant to bankruptcy Rule 3002.1 (b) and Local Rule 20-3007.
2. The terms of the forbearance are as follows: Regular monthly mortgage payments starting with the July 1, 2020 through September 30, 2020 are suspended. Payment of the escrow component of the regular monthly mortgage payments (shall also be suspended).
3. The Creditor advises that no fees will be assessed against the loan with regard to this Notice of Forbearance.

4. Prior to the expiration of the forbearance period, Debtor must either (1) request additional forbearance time under Local Rule, State or Federal Law; (2) enter into loss mitigation with Creditor; or (3) file an Amended Chapter 13 Plan which cures the arrears resulting from the forbearance period over the remainder of the Chapter 13 Plan.
5. Creditor, does not waive any rights to collect the payments that come due during the forbearance period or any payments that were due and owing prior to the forbearance period. The payment post-petition amount due at the time of this forbearance is \$1,769.15.
6. Creditor does not waive its rights under the terms of the note and mortgage or under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

/s/ Mario J. Hanyon, Esquire

Mario J. Hanyon, Esq., Id. No.203993

Phelan Hallinan Diamond & Jones, LLP

1617 JFK Boulevard, Suite 1400

One Penn Center Plaza

Philadelphia, PA 19103

Phone Number: 215-563-7000 Ext 31340

Fax Number: 215-568-7616

Email: mario.hanyon@phelanhallinan.com

August 3, 2020

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| Respondent | : | |

CERTIFICATE OF SERVICE

I hereby certify that service upon all interested parties, indicated below was made by sending true and correct copies of the Notice of Forbearance by electronic means on August 3, 2020.

JEFFREY C. MCCULLOUGH
Bond & McCullough
16 N. Franklin Street
Suite 300
Doylestown, PA 18901

Patricia F. Kent
25 Quince Circle
Newtown, PA 18940

SCOTT F. WATERMAN (Chapter 13)
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

U.S. Trustee
United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

/s/ Mario J. Hanyon, Esquire
Mario J. Hanyon, Esq., Id. No.203993
Phelan Hallinan Diamond & Jones, LLP
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103
Phone Number: 215-563-7000 Ext 31340
Fax Number: 215-568-7616
Email: mario.hanyon@phelanhallinan.com

August 3, 2020